

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: June 13, 2024 at 1:00 P.M. ET

Objection Deadline: May 31, 2024 at 4:00 P.M. ET

Ref. Nos. 14586 & 14598

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' THIRTY-FIFTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew A. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On May 10, 2024, the Debtors filed the *Debtors’ Thirty-Fifth (Non-Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims)* [D.I. 14586, sealed & 14598, redacted] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 14586-1 & 14598-1], any responses to the Objection were to be filed no later than May 31, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The Debtors received informal responses (the “Informal Responses”) to the Objection from the holders of claim number 2004, 2011, and 53052.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. On May 31, 2024, Elaine Miao filed a letter in response to the Objection [D.I. 16250] (the “Miao Response”).

5. On July 5, 2024, Seral Polimer Kimya Plastik SAN VE TIC LTD STI (“Seral Polimer”) filed a letter in response to the Objection [D.I. 19728] (the “Seral Polimer Response”)

6. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

7. The Debtors are withdrawing the Objection solely with regard to claim numbers 2004, 2011, 53052 and 4546 without prejudice and with all rights of the parties reserved with regard thereto.

8. The Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournment of the Objections as Elaine Miao’s proof of claim and Seral Polimer’s proof of claim and the withdrawals noted above. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Official Committee of Unsecured Creditors (the “Committee”), and the Committee has no objection to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

9. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: November 27, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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